

MS Assc. for Home Care 30(b)(6) Rebecca Knight 10/20/2023

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

CHARLES SLAUGHTER

PLAINTIFF

V. CIVIL ACTION NO. 3:20-cv-789-CWR-FKB

DR. DANIEL P. EDNEY, IN  
HIS OFFICIAL CAPACITY AS  
THE MISSISSIPPI STATE  
HEALTH OFFICER, ET AL.

DEFENDANTS

30(B)(6) DEPOSITION OF  
MISSISSIPPI ASSOCIATION FOR HOME CARE

REBECCA KNIGHT

Taken at the instance of the Plaintiff at  
Butler Snow, LLP, 1020 Highland Colony Parkway,  
Suite 1400, Ridgeland, Mississippi, on Wednesday,  
April 19, 2023,  
beginning at 8:56 a.m.



REPORTED BY:

GINGER H. BROOKS, CCR #1165  
CRR, RPR, CRC, CCR, CLR, RSA

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1 MR. RICE: Objection to form.

2 MR. DAVIS: Ms. Knight, if I thought  
3 long enough, I could probably ask more  
4 questions, but I'm going to tender the  
5 witness.

6 EXAMINATION BY MR. SHELVER:

7 Q. I just have a few questions, very  
8 briefly.

9 You mentioned patient census several  
10 times today, and I just want you to define or  
11 explain what you mean by "patient census" for the  
12 Court.

13 A. Patient census is the patients that we  
14 serve. It's the unique number.

15 I mean, it's -- we could look at it a  
16 couple of different ways.

17 You can look at it as a current. If I  
18 were to tell you today I have a patient census of  
19 this, that might represent the number of patients  
20 that I have currently actively on home care.

21 And then you could also view patient  
22 census as patients served, how many patients  
23 served that may not -- no longer be active on home  
24 care.

25 Q. So if the CON and the moratorium were

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1 removed and the market was opened wide up like  
2 Mr. Slaughter wants, explain to me what would  
3 happen, generally.

4 A. Well, generally, that patient census  
5 would decline, and it would be dispersed among who  
6 knows how many companies, and then you would see a  
7 lack of investment dollars to improve care. I  
8 believe you would see that increased opportunity  
9 for fraud. And I believe that because that's what  
10 we see. We've seen that in other states.

11 Q. If you had to tell the Court which parts  
12 of the state would be more adversely affected by  
13 the reduction in the patient census, what would  
14 you say?

15 A. The rural areas.

16 Q. Rural areas?

17 A. Absolutely.

18 Q. Why is that?

19 A. Because, again, in order to even operate  
20 with positive margins, you have to have a patient  
21 population that's going to support that, and you  
22 would -- you would tend to migrate to those  
23 geographies where the density of that patient  
24 population was greater.

25 Q. In Mississippi, where are the greatest

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1 CERTIFICATE OF COURT REPORTER

2 I, Ginger H. Brooks, Court Reporter and  
3 Notary Public, in and for the State of  
4 Mississippi, hereby certify that the foregoing  
5 contains a true and correct transcript of the  
6 testimony of REBECCA KNIGHT, as taken by me in the  
7 aforementioned matter at the time and place  
8 heretofore stated, as taken by stenotype and later  
9 reduced to typewritten form under my supervision  
10 by means of computer-aided transcription.

11 I further certify that under the  
12 authority vested in me by the State of Mississippi  
13 that the witness was placed under oath by me to  
14 truthfully answer all questions in the matter.

15 I further certify that, to the best of  
16 my knowledge, I am not in the employ of or related  
17 to any party in this matter and have no interest,  
18 monetary or otherwise, in the final outcome of  
19 this matter.

20 Witness my signature and seal this the  
21 9th day of November, 2023.

22

23

24

25

My Commission Expires:  
September 18, 2025

  
GINGER H. BROOKS, #1165  
CRR, RPR, CCR

